

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Plaintiffs,

-against-

Defendants.

I, Aaron Schlanger, declare as follows:

2. Attached hereto as **Exhibit A** is a true and correct copy of a monograph titled “Crisis in Lebanon: Anatomy of a Financial Collapse,” by James Rickards, published by FDD Press in August 2020.

4. Attached hereto as **Exhibit C** is a true and correct copy of the production order that was issued by Magistrate Judge Pohorelsky in *Linde v. Arab Bank, Plc*, No. 04-cv-2799 (BMC)(VVP). The order served as the basis for Plaintiffs' motion for Rule 37 sanctions in that case. Magistrate Judge Pohorelsky originally issued the order on May 7, 2007, and provided a

copy of the order to counsel via facsimile. The order was later re-signed by Judge Pohorelsky on June 27, 2007, and docketed as ECF No. 402 in *Linde*.

5. Attached hereto as **Exhibit D** is a true and correct copy of the Rule 1006 Trial Exhibit which quantifies the number of Saudi Committee recipients covered by paragraph 1 of the *Linde* court's May 7, 2007, Production Order.

6. Attached hereto as **Exhibit E** is a true and correct copy of an article titled "Arab League brands Hezbollah a terrorist organisation," from BBC.com, dated March 11, 2016.

7. Attached hereto as **Exhibit F** is a true and correct copy of an article titled "Bassil: Everyone in Lebanon is Hizbullah Partner," from Naharnet Newsdesk, dated August 5, 2019.

8. Attached hereto as **Exhibit G** is a collection of true and correct copies of Jebran Bassil's statements on Twitter while serving as Lebanon's foreign minister.

9. Attached hereto as **Exhibit H** is a true and correct copy of an article titled "The multi-billion dollar question: Tracing Lebanon's growing offshore wealth amid financial collapse," by Albin Szakola in L'Orient Today, dated April 29, 2022.

10. Attached hereto as **Exhibit I** is a true and correct copy of a press release by the International Monetary Fund titled "IMF Reaches Staff-Level Agreement on Economic Policies with Lebanon for a Four-Year Extended Fund Facility," dated April 7, 2022.

11. Attached hereto as **Exhibit J** is a true and correct copy of the Statement from the Judges Club of Lebanon, published on January 7, 2022, included in the Special Appendix in *Raad v. Bank Audi SAL*, No. 21-2612, currently pending before the Court of Appeals for the Second Circuit.

12. Attached hereto as **Exhibit K** is a list of 95 individuals and entities delineated in Plaintiffs' First Request for the Production of Documents that are not listed in the Second Amended Complaint, together with brief summaries of their relationship to Hezbollah.

13. Attached hereto as **Exhibit L** is a true and correct copy of Defendant BLOM Bank SAL's letter to Plaintiffs' counsel, dated April 22, 2022.

14. Attached hereto as **Exhibit M** is a true and correct copy of Exhibit B to the Defendants' joint memorandum of law in support of their pending motions to dismiss (ECF No. 209-4).

15. Attached hereto as **Exhibit N** is a true and correct copy of Defendant Bank of Beirut's Responses and Objections to Plaintiffs' First Request for the Production of Documents, dated March 18, 2022.

16. Attached hereto as **Exhibit O** is a true and correct copy of Defendant Bank Audi's letter to Plaintiffs' counsel, dated April 22, 2022.

17. Attached hereto as **Exhibit P** is a true and correct copy of Defendant Banque Libano-Française's letter to Plaintiffs' counsel, dated April 22, 2022.

18. Attached hereto as **Exhibit Q** is a true and correct copy of Defendant Bank Audi's Responses and Objections to Plaintiffs' First Set of Requests for Production, dated March 18, 2022.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on May 2, 2022

/s/ Aaron Schlanger